

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

UNITED STATES OF AMERICA	)	
	)	
v.	)	INDICTMENT NO.
	)	1:18-CR-98-SCJ-LTW
MITZI BICKERS	)	
	)	
Defendants.	)	

DEFENDANT’S SUPPLEMENTAL REQUEST FOR JURY INSTRUCTIONS

Comes Now Mitzi Bickers, by and through undersigned counsel, and file this supplemental request for jury instructions. Based on the evidence presented at trial, Ms. Bickers respectfully requests the Court provide the following additional instruction to the previously submitted request:

Section 666 does not prohibit all gifts by or to a public official, does not prohibit all receipts – does not prohibit receipt of all gifts by or to a public official, but only gifts received with the corrupt intent to be influenced or rewarded by that governmental official in connection with a business or transaction or series of transactions of that governmental entity involving \$ 5,000 or more.

United States v. McNair, 605 F.3d 1152, 1194 (11th Cir. 2010)

Respectfully requested this 21<sup>st</sup> day of March, 2022.

s/Zachary Kelehear  
Ga. Bar No. 925716